

Christopher L. Parnell, OSB No. 054352  
Email: [cparnell@dunncarney.com](mailto:cparnell@dunncarney.com)  
Dunn Carney Allen Higgins & Tongue LLP  
851 SW Sixth Avenue, Suite 1500  
Portland, OR 97204-1357  
Telephone: 503.224.6440  
Fax: 503.224.7324

Attorneys for Debtors

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re

Northland Holdings LLC,  
Debtor.

Case No. 14-36742-11

In re

Muskie Properties, LLC,  
Debtor.

Case No. 14-36745-11

**DEBTORS' MOTION FOR JOINT  
ADMINISTRATION OF CHAPTER  
11 CASES**

***EXPEDITED HEARING  
REQUESTED***

Northland Holdings LLC ("Northland") and Muskie Properties, LLC ("Muskie") (together, "Debtors") move the Court pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure for entry of an order directing joint administration of their related Chapter 11 cases, and in support thereof respectfully represent as follows:

1           1.       The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and  
2       1334. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core  
3       proceeding pursuant to 28 U.S.C. § 157(b)(2).

4           2.       The statutory predicate for the relief requested herein is Rule 1015(b) of the  
5       Federal Rules of Bankruptcy Procedure.

6           3.       On December 10, 2014 (the "Petition Date"), Debtors filed voluntary petitions  
7       for relief under Chapter 11 of Title 11 of the United States Code.

8           4.       Debtors have continued in possession of their property and are continuing to  
9       operate and manage their business as debtors-in-possession pursuant to §§ 1107(a) and 1108  
10      of the Bankruptcy Code. No request has been made for the appointment of a trustee or  
11      examiner, and an official committee has not yet been established in this case.

12          5.       Northland is an Oregon limited liability company formed in 2007 with its  
13      principal place of business in Bend, Oregon.

14          6.       Muskie is a Washington limited liability company formed in 2007, with its  
15      principal place of business in Bend, Oregon.

16          7.       Northland and Muskie are each wholly owned by Gerlicher Company LLC.

17          8.       Northland and Muskie, as tenants-in-common, own and operate commercial  
18      real property located at 916 Lake Shore Drive in Ashland, Wisconsin (the "Property"). The  
19      Property has a single tenant, the General Services Administration on behalf of the Bureau of  
20      Indian Affairs.

21          9.       As of the Petition Date, Debtors were indebted to Wells Fargo Bank, National  
22      Association in the approximate principal amount of \$3,110,000 as co-borrowers with joint  
23      and several liability. The obligations of Debtors to Wells Fargo are secured by a perfected  
24      first security interest in substantially all of Debtors' assets, including rents.

1           10. By this Motion, Debtors seek entry of an order directing joint administration,  
2 pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure, of case numbers 14-  
3 36742-11 and 14-36745-11 (together, the "Chapter 11 Cases").

4           11. Rule 1015(b) provides, in relevant part, "If...two or more petitions are  
5 pending in the same court by...a debtor and an affiliate, the court may order a joint  
6 administration of the estates."

7           12. Debtors believe joint administration of the Chapter 11 Cases is warranted  
8 because (a) Northland and Muskie are both wholly owned by Gerlicher Company LLC,  
9 (b) the Property is owned by Northland and Muskie as tenants-in-common, (c) Northland and  
10 Muskie's primary asset is the Property that they jointly own, (d) Northland and Muskie, as  
11 co-borrowers, are jointly and severally liable on the aforementioned debt owing to Wells  
12 Fargo, (e) Debtors have essentially the same obligations to the same unsecured creditors,  
13 (f) Debtors intend to file a plan of reorganization at the same time providing for a common  
14 treatment of Debtors' creditors, and (g) entry of an order directing joint administration of the  
15 Chapter 11 Cases will obviate the need for duplicative notices, applications, and orders,  
16 saving time and expense for the Court and Debtors and avoiding confusion on the part of  
17 creditors.

18           13. A copy of the proposed Order Authorizing Joint Administration of the  
19 Chapter 11 Cases is attached hereto as **Exhibit 1**.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

DATED: December 10, 2014.

*/s/ Christopher L. Parnell*  
Christopher L. Parnell, OSB No. 054352  
Email: [cparnell@dunncarney.com](mailto:cparnell@dunncarney.com)  
Attorneys for Debtors

# **EXHIBIT 1**

## **PROPOSED FORM OF ORDER**

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re

Northland Holdings LLC,

Debtor.

Case No. 14-36742-11

In re

Muskie Properties, LLC,

Debtor.

Case No. 14-36745-11

**ORDER DIRECTING JOINT  
ADMINISTRATION OF CHAPTER 11  
CASES**

THIS MATTER having come before the Court upon the Motion for Joint Administration of Chapter 11 Cases (the "Motion"); the Court having reviewed the Motion and the files and records in this case; it appearing that this Court has jurisdiction over the matter pursuant to 28 U.S.C. § 157(b)(2); the Court having determined that the relief requested is warranted and in the best interest of Debtors, their respective estates, their creditors and other parties in interest; it appearing that no further notice of the Motion is necessary under the particular circumstances; and finding good and sufficient cause;

NOW THEREFORE,

IT IS HEREBY ORDERED that the following Chapter 11 cases shall be jointly administered by the Court:

1. *In re Northland Holdings LLC*, Case No. 14-36742-11.
2. *In re Muskie Properties, LLC*, Case No. 14-36745-11.

# # #

I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

DUNN CARNEY ALLEN HIGGINS & TONGUE LLP

By /s/ Christopher L. Parnell

Christopher L. Parnell, OSB No. 054352  
851 S.W. Sixth Avenue, Suite 1500  
Portland, OR 97204  
Telephone: 503-224-6440  
Facsimile: 503-224-7324  
E-mail: cparnell@dunncarney.com  
Attorneys for Debtors

cc: List of Interested Parties